

From: [Michael Stephenson](#)
To: [Akhter Hossain](#)
Cc: mkamal@kdheks.gov; [Jump, Christine](#); [SMITH, MARTIN L](#); [Brady Gerber](#); [Stuart Klaus](#)
Date: Wednesday, September 03, 2014 5:29:34 PM
Attachments: [Revised Figure 9.pdf](#)

Hello Akhter,

We have reviewed your email of September 2 to Lon Stewart. While we understand the conditions of approval for proceeding with "Incomplete Closure" of the buildings in question we also see some inconsistent guidance from you regarding building floor concrete use a rubble fill. In particular, I have pasted language used repeatedly in your email, below:

"In case the facility decide to use the concrete flooring as a backfill, facility will be required to get approval from EPA Region 7."

We are proceeding with the plan for concrete re-use as has been discussed with you and Mustafa on several occasions previously. Specifically, we are using the color coded map, Figure 9 (attached), to identify where soil/concrete interface samples will be taken in advance of removal of the overlying concrete. For Building B, four shallow soil samples will be collected along the light green line in the northern portion of the building to further delineate areas where the underside of the concrete may be impacted. In Building D, four soil samples will be advanced along the light green line in the northeastern portion of the building. In the processing area, four soil samples will be collected along the light green and yellow line in the western portion of the processing area.

If those samples show that the interface soils have concentrations of the VOC or SVOC constituents at levels meeting the RSK Tier II values then the overlying concrete can be used as backfill. Similarly, if samples come back over the limit then the concrete will be taken for off-site hazardous waste disposal. Also, if staining in any area under the concrete appears to be the result of spills reaching the sub-grade, such as where there was an overlying gap, then CHES will dispose of the concrete off-site.

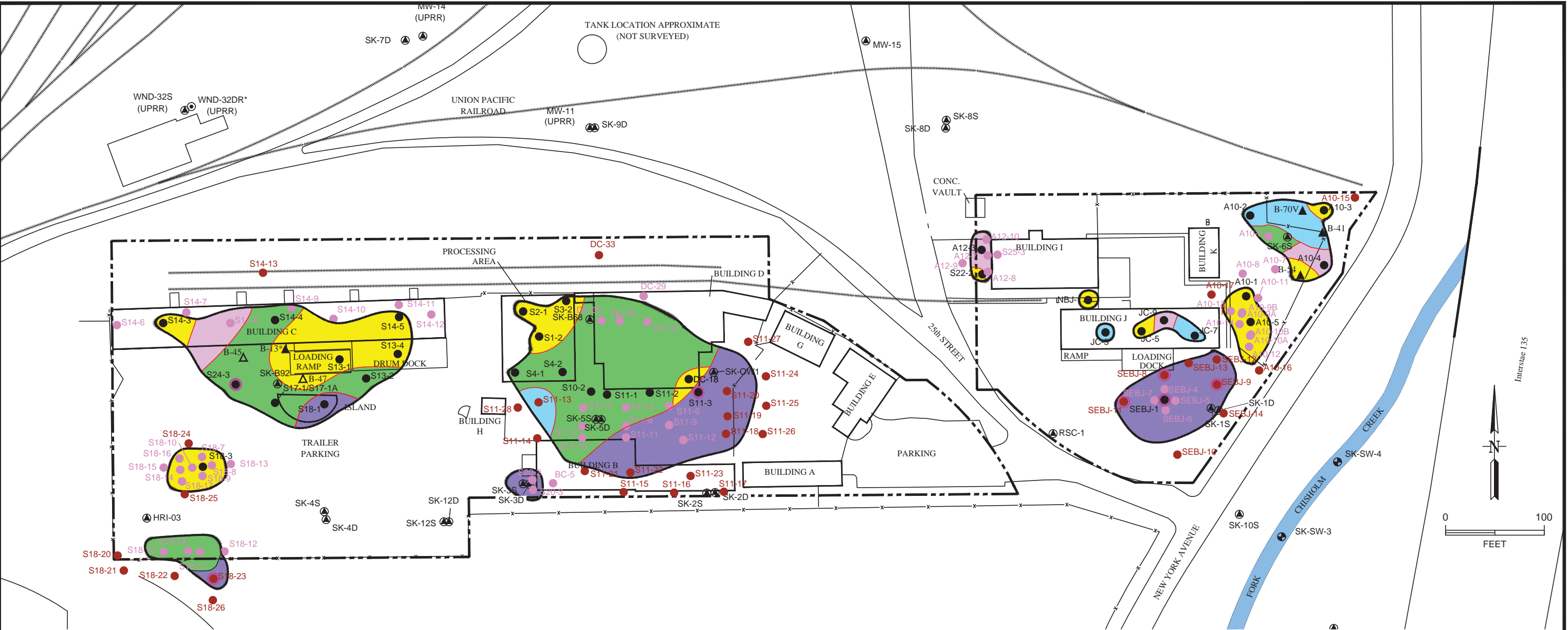
We have to rely on our previous re-use plan as accepted by you just as we have implemented it for Building J. Ms. Jump has indicated her acceptance of this plan during our call with her and you on August 19. Please acknowledge that your intention is NOT to change the plan as accepted by you previously at this late date.

Sincerely,

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LEGEND

- ▲ GROUNDWATER MONITORING WELL (2 INCHØ)
- ▲ (UPRR) INDICATES A WELL ON UPRR PROPERTY
- GEOPROBE MONITORING WELL (1 INCHØ)
- SURFACE WATER SAMPLE
- RAILROAD TRACKS
- x— FENCE
- FACILITY BOUNDARY (NOT SURVEYED)
- * WELL NOT SURVEYED, LOCATION APPROXIMATE

- ▲ HISTORICAL GEOPROBE SOIL BORING LOCATION
- ▲ HISTORICAL GEOPROBE SOIL BORING (GEOPROBE WATER SAMPLE ALSO COLLECTED)
- DIRECT PUSH SOIL SAMPLE LOCATION
- DIRECT PUSH SOIL SAMPLE LOCATION (DEC. 2013)
- DIRECT PUSH SOIL SAMPLE LOCATION (JAN. 2014)

DEPTHS AT WHICH KDHE STANDARDS ARE EXCEEDED

- 0-5' DEPTH
- 0-10' DEPTH
- 0-15' DEPTH
- 5-10' DEPTH
- 10-15' DEPTH
- 10-20' DEPTH
- TOTAL EXTENT OF ORGANIC COMPOUNDS

DRAFT

BY	DATE
DRAWN JGM	12/23/13
CHECKED	
REVISED JGM	01/13/14
APPROVED	
APPROVED	
APPROVED	

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FIGURE 9		
TOTAL EXTENT of ORGANIC COMPOUNDS EXCEEDING PRELIMINARY RAO (0 - 20ft) CLEAN HARBORS KANSAS, LLC		
SCALE:	AS SHOWN	PROJECT: 1808